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October 26, 2001

VIA HAND DELIVERY

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505


***Re: Rulemaking Amendments of Regulations for Telephone Service Providers
Docket No. 00-00873.***

Dear Mr. Waddell:

We believe we may have inadvertently omitted page eight of the filing we made earlier today when we submitted 13 copies of the Comments of Concord Telephone Exchange, Inc., Humphreys County Telephone Company, Tellico Telephone Company, Inc., and Tennessee Telephone Company on Draft Proposed Rules Filed by TRA Staff on August 16, 2001 for filing in the above-referenced docket. In order to rectify this matter, we are submitting 13 copies of page eight for filing. We apologize for any inconvenience this has caused you.

Should you have any questions with respect to this filing, please do not hesitate to contact me.

Very truly yours,


R. Dale Grimes *by J/S*

RDG/gci
Enclosures
cc: Certificate of Service List
Mr. Bruce H. Mottern

* * *

1220-4-2.16(1)(n) (Industry Version)

TDS TELECOM Comments: The financial impact on TDS TELECOM of the requirement to expand hours of coverage until 10:00PM to meet the 30-second average speed of answer service level requirement is approximately \$378,000, with recurring costs of \$272,000. This amount includes staffing, equipment and training.

* * *

1220-4-2-.17

* * *

(2) Installation of Primary Service Orders

* * *

- (b) An ETC shall credit the affected customer an amount equal to \$5.00 per day for every day over ~~three (3)~~ five (5) business days or the customer agreed to commitment date the customer's primary service order is not completed up to a maximum of forty (40) days or \$200.

* * *

Conclusion

The proposed Rules would increase regulatory involvement in the telecommunications industry, placing additional regulatory burdens and operational costs on carriers during this time of movement toward deregulation and competition. TDS TELECOM understands the importance of delivering quality service and is committed to that goal. The proposed Rules, however, are unnecessary, especially given that there has been no factual showing that TDS TELECOM customers have received anything less than quality service. Further, the proposed